

**Commonwealth of Kentucky
Division for Air Quality**

PERMIT APPLICATION SUMMARY FORM

Completed by: Dorothy Nguyen

GENERAL INFORMATION:

| | |
|----------------------------|---|
| Name: | Fosroc Inc. |
| Address: | 152 Carley Ct, Georgetown, Kentucky 40324 |
| Date application received: | December 18, 2001 |
| SIC/Source description: | 3087/Custom Compounding of Purchased Resins |
| AFS Plant ID: | 21-209-00017 |
| Application log number: | 54321 |
| Permit number: | F-02-004 |

APPLICATION TYPE/PERMIT ACTIVITY:

| | |
|--|--|
| <input checked="" type="checkbox"/> Initial issuance | <input type="checkbox"/> General permit |
| <input type="checkbox"/> Permit modification | <input checked="" type="checkbox"/> Conditional major |
| __Administrative | <input type="checkbox"/> Title V |
| __Minor | <input type="checkbox"/> Synthetic minor |
| __Significant | <input type="checkbox"/> Operating |
| <input type="checkbox"/> Permit renewal | <input checked="" type="checkbox"/> Construction/operating |

COMPLIANCE SUMMARY:

| | |
|---|---|
| <input type="checkbox"/> Source is out of compliance | <input type="checkbox"/> Compliance schedule included |
| <input checked="" type="checkbox"/> Compliance certification signed | |

APPLICABLE REQUIREMENTS LIST:

| | | |
|--|--|--------------------------------|
| <input type="checkbox"/> NSR | <input type="checkbox"/> NSPS | <input type="checkbox"/> SIP |
| <input type="checkbox"/> PSD | <input type="checkbox"/> NESHAPS | <input type="checkbox"/> Other |
| <input type="checkbox"/> Netted out of PSD/NSR | <input type="checkbox"/> Not major modification per 401 KAR 51:017, 1(2)(b) or 51:052,1(14)(b) | |

MISCELLANEOUS:

- ☐ Acid rain source
- ☐ Source subject to 112(r)
- ☒ Source applied for federally enforceable emissions cap
- ☐ Source provided terms for alternative operating scenarios
- ☐ Source subject to a MACT standard
- ☐ Source requested case-by-case 112(g) or (j) determination
- ☐ Application proposes new control technology
- ☒ Certified by responsible official
- ☒ Diagrams or drawings included
- ☒ Confidential business information (CBI) submitted in application
- ☐ Pollution Prevention Measures
- ☐ Area is non-attainment (list pollutants):

EMISSIONS SUMMARY:

| Pollutant | Actual (tpy) | Potential (tpy) |
|-----------|--------------|-----------------|
| PM | 6.59 | 6.59 |
| VOC | 25.64 | 46.76 |
| Styrene* | 6.59 | 9.0 |

*Source has accepted an allowable of 9.0 tons per year or less.

SOURCE PROCESS DESCRIPTION:

Fosroc Incorporation manufactures chemical grouts. The Fosroc's Georgetown, Kentucky facility has three distinct manufacturing processes: Polyester Resin Cartridge Production, Cement Grout Production (including Liquid Mix Production) and Air Sealant Production. During the time lapse between delivery and processing, the material will be stored in one or more of Silos, and storage tank (Polyester Resin Storage Tank).

Polyester Resin Cartridge Production process with raw material are transfer into the mastic and/or paste mixers as appropriate and mixed to form either mastic or paste. Then the mastic and paste are then transfer into the hoppers which is then pumped into the cartridge production unit (ILU) which extrudes the mastic and paste into a plastic film tube. The filled tubes are then clipped and cut to the desired length.

Cement Grout Production (including Liquid Mix Production): For powder mix production, raw materials are transfer into the powder blending mixers as appropriate and mixed to yield cementitious grouts which are then packaged in bags. For liquid mix production, all raw materials are transferred into the liquid mixer as appropriate and mixed to yield polyester resin mastic, which is packaged in cans.

Air Sealant Production: All raw materials are transferred into the air sealant mixers as appropriate and mixed to produce air sealant which is then packaged in pails.

Applicable regulations:

401 KAR 59:010, New Process Operations, applies to the particulate matter generated by the above facilities.

EMISSION AND OPERATING CAPS DESCRIPTION

Fosroc's Georgetown, Kentucky has requested that a conditional major permit be issued with federally enforceable conditions to limit emissions of styrene to below major thresholds. It is proposed to limit the operating hour of affected facility to between 2080 and 2772 hrs/year, which will limit the HAP emissions to 9.0 tons per year or less.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.